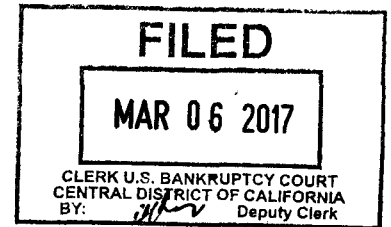


UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA



IN RE:

CHAPTER 7

OLA BOYKIN,

Case No. 2:16-bk-25802-TD

Debtor

Adversary Proceeding

ARMINE CAMPBELL,

No: _____

Plaintiff,

Vs

OLA BOYKIN, LISA HAWKINS,
STREAMLINE TRUCKING, LLC, and
DOES 1-20, Inclusive.

**COMPLAINT TO DETERMINE DISCHARGEABILITY
AND OBJECTING TO DEBTOR'S DISCHARGE PURSUANT
TO SECTION 523 AND 727 OF THE BANKRUPTCY CODE**

Plaintiff, Armine Campbell alleges as follows:

JURISDICTION

1. Debtor and defendant, Ola Boykin, filed the above entitled Chapter 7 bankruptcy case on December 1, 2016.
2. On January 6, 2017 the debtor's duly noticed meeting of creditors was held. Plaintiff attended said meeting of creditors to lodge her objection to debtor's discharge. The Court suggested that plaintiff file a proof of claim and an adversary complaint.

3. As of this date this complaint the debtor as not been granted a discharge.
4. This complaint is timely because the date by which a complaint objecting to debtor's discharge expires on March 7, 2017.
5. This is an Adversary Proceeding in which plaintiff-creditor is objecting to the debtor's discharge under Bankruptcy Code 727(a)(3) and 727(a)(4) and is seeking a determination as to the dischargeability of the debt owed by debtor to plaintiff under Bankruptcy Code 523(a)(2).
6. This court has jurisdiction over this adversary proceeding pursuant to 28 U.S.C. 1334 and Bankruptcy Code, sections 523 and 727.
7. This case is a core proceeding pursuant to 28 U.S.C. 157(B)(2)(1).

PARTIES

8. Plaintiff is an individual who was recruited, courted, and targeted by debtor, Ola Boykin, who allegedly doing business as Streamline Trucking, LLC. Her business partner, Lisa Hawkins, who alleges to hold a doctorate degree and an ordained minister, both approached plaintiff to invest \$40,000.00 in their trucking business, with promises of a large return on plaintiff's investment. The \$40,000 investment by plaintiff was supposed to be for the purchase of two 18 wheeler long distance trucks. As far as plaintiff can determine, no trucks were ever purchased with the funds provided by plaintiff.
9. Streamline Trucking, LLC is a Texas based company, although both defendants reside in California. Plaintiff alleges that defendants had no trucks, no contracts for delivery of goods, and legitimate business.
10. Plaintiff is informed and believes and hereon alleges that defendants, Boykin and Hawkins spend plaintiff's money lavishly on trips, clothing, jewelry, and other personal items. There is

no evidence that any investment in Streamline Trucking was made with the funds provided by plaintiff.

GROUND FOR RELIEF

11. Section 523(a)(2) of the Bankruptcy Code provides that a debtor cannot discharge a debt "for money, property, or services obtained by "false pretenses, a false representation, or actual fraud". In this case the \$40,000 paid by plaintiff over to defendants (see exhibit A) pursuant to the contract presented by defendants (exhibit B) was for the purchase of two 18 wheeler trucks to be used to haul good across country. The amount of money needed for the purchase or lease would be substantially more than the \$40,000 set forth in the agreement.
12. Section 523(a)(4) of the Bankruptcy Code provides that: "a discharge under 727,1141,of this title DOES NOT DISCHARGE an individual debtor from any debt-
"for fraud or defalcation while acting in a fiduciary capacity, embezzlement, or larceny"
13. It is clear from the conduct of defendants, and each of them, that their sole intent was to defraud plaintiff with a promise of a lucrative investment in the trucking business for which neither defendant had any expertise, skill, or ability. Further, the long distance trucks that defendants promised to buy never materialized. Plaintiff's money was spent by Boykin and Hawkins for the personal benefit.
14. The defendants herein have committed fraud, embezzlement, and grand larceny and are liable both civilly and criminally and plaintiff, in addition to this adversary complaint, has filed a police report with the Los Angeles police department and is awaiting resolution from LAPD.
15. Plaintiff has been damaged in the sum of at least \$35,000.00 plus additional damages for costs, time and labor in attempting to recover said embezzled funds, damages for intentional infliction of emotional distress, and punitive damages in a sum according to proof.

WHEREFORE, plaintiff respectfully requests that the court enter a judgment declaring that the debt owed to plaintiff is nondischargeable under sections 523 and 727 of the bankruptcy code; for an order requiring debtor, Ola Boykin, to pay over to plaintiff the sum of \$35,000.00 in compensatory damages plus an addition sum, according to proof, for costs, punitive damages, and intentional infliction of emotional distress. If debtor is unable to liquidate her assets to pay plaintiff, then plaintiff asks the court to deny debtor a discharge, and for such other and further relief as the court deems just and proper.

Dated: March 6, 2017



ARMINE CAMPBELL

1741 W. 105th Street

Los Angeles, CA. 90047

(323) 702-2218

Plaintiff in Pro Per

VERIFICATION

I, Armine Campbell declare that I am the plaintiff in the above entitled action and I have read and understood the above Complaint to Determine Dischargeability of Debt and know its contents. The same is true of my own knowledge, except as to those matters that are alleged on information or belief, and as to those matters, I believe to be true.

I declare under penalty that the foregoing is true and correct. Executed this 6th day of March, 2017 in Los Angeles, CA. 90305.

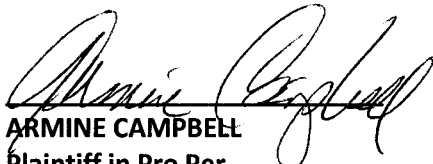

ARMINE CAMPBELL
Plaintiff in Pro Per

Exhibit "A"

3222

THIS DOCUMENT HAS AN ARTIFICIAL WATERMARK PRINTED ON THE BACK. THE FRONT OF THE DOCUMENT HAS A MICRO-PRINT SIGNATURE LINE. ABSENCE OF THESE FEATURES WILL INDICATE A COPY.

099062 / M 3394824

FirstCity
CREDIT UNION

PO BOX 88008 • LOS ANGELES, CA 90086-0008 • 800-844-2200 • firstcitycu.org

PAYABLE THROUGH BANK: NA, EUFALA, OK

Cashier's Check

NCUA

No. 0002193382

09/24/15

\$20,000.00

*** TWENTY THOUSAND DOLLARS AND 00 CENTS ***

PAY EXACTLY 20,000dols 00 cts

TO THE ORDER OF STREAMLINE WORKING INC
RE: ARMINE R CAMPBELL

AUTHORIZED SIGNATURE *My S. Oth*

NOT VALID AFTER 180 DAYS

49-55
103T

⑈0002193382⑈ ⑆103100551⑆0140010167917⑈

Jul 14 2016 15:23:56 18665364684 ->

Moneygram

Page 003



PO BOX 86008 • LOS ANGELES, CA 90086-0008 • 800-944-2200 • firstcitycu.org

Cashier's Check



No. 0002196129

*** TWENTY THOUSAND DOLLARS AND 00 CENTS ***

11/16/15
\$20,000.00

PAY EXACTLY 20,000 dols 00 cts

NOT VALID AFTER 180 DAYS

TO THE
ORDER OF

STREAMLINE TRUCKING, LLC
RE: ARMINE R CAMPBELL

AUTHORIZED SIGNATURE

Armine R Campbell

⑈0002196129⑈ ⑈10310055⑈⑈1400101679⑈⑈

Armine R Campbell

W.P. it to Personal Act, Partale 11/20/15

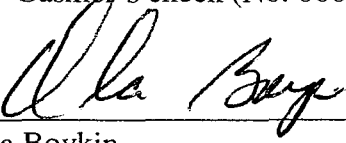
Exhibit "B"

STREAMLINE TRUCKING, LLC

14241 Dallas Parkway, Suite 650
Dallas, Texas 75254

This Agreement is between Streamline Trucking, LLC (Ola Boykin, Managing Partner, Borrower) and Armine R. Campbell (Lender) and Dr. Rita Hawkins (Streamline's Financial Consultant).

1. Ola Boykin, Managing Partner of Streamline Trucking, LLC (Borrower) has the authority to borrow funds on behalf of the company.
2. Armine R. Campbell (Lender) is to loan Borrower the sum of \$20,000 for her trucking company. In consideration of this loan, Borrower will pay Lender the amount of \$2600 a month for 12 months, beginning November 9, 2015, ending November 9, 2016 with a balloon payment of \$1,000 December 9, 2016.
3. A 10% late fee will be assessed if payments are more than 5 days late.
4. Payment will be in the form of Cashier's payable to Armine Campbell which will be delivered by Dr. Hawkins (Streamline's Financial Consultant).
5. This contract cannot be changed or sold to anyone without both parties agreeing and signing an amended contract.
6. This contract is done in faith by all parties. May God continue to bless this contract and success to this business and business relationship between all parties. The money will be used for purchasing at least two tractors and working capital.
7. This document is notarized to make it legal and binding.
8. Any correspondence regarding the contract will be communicated via Dr. Hawkins only. Also, attached please find a copy of the driver's license for Ola Boykin and the company's business license.
9. Cashier's check (No. 0002193382) in the amount of \$20,000 received on 9/24/15.



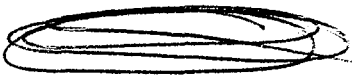
Ola Boykin

Date: 9/25/15



Armine R. Campbell

Date: _____



Dr. Rita Hawkins

Date: 9/25/15

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address ARMINE CAMPBELL 1741 W. 105th Street Los Angeles, CA. 90047 (323) 702-2218 Plaintiff in Pro Per</p>		<p>FOR COURT USE ONLY</p>	
<p>Attorney for Plaintiff</p>			
<p>UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION</p>			
<p>In re:</p> <p>OLA BOYKIN,</p> <p>Debtor(s).</p>		<p>CASE NO.:</p> <p>CHAPTER: 7</p> <p>ADVERSARY NO.:</p>	
<p>ARMINE CAMPBELL,</p> <p>Versus</p> <p>OLA BOYKIN, LISA HAWKINS, STREAMLINE TRUCKING, LLC, and DOES 1-20, Inclusive.</p> <p>Plaintiff(s)</p> <p>Defendant(s)</p>		<p>SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]</p>	

TO THE DEFENDANT: A Complaint has been filed by the Plaintiff against you. If you wish to defend against the Complaint, you must file with the court a written pleading in response to the Complaint. You must also serve a copy of your written response on the party shown in the upper left-hand corner of this page. The deadline to file and serve a written response is _____. If you do not timely file and serve the response, the court may enter a judgment by default against you for the relief demanded in the Complaint.

A status conference in the adversary proceeding commenced by the Complaint has been set for:

Hearing Date: _____

Time: _____

Courtroom: _____

Address:

☐ 255 East Temple Street, Los Angeles, CA 90012

☐ 3420 Twelfth Street, Riverside, CA 92501

☐ 411 West Fourth Street, Santa Ana, CA 92701

☐ 1415 State Street, Santa Barbara, CA 93101

☐ 21041 Burbank Boulevard, Woodland Hills, CA 91367

You must comply with LBR 7016-1, which requires you to file a joint status report and to appear at a status conference. All parties must read and comply with the rule, even if you are representing yourself. You must cooperate with the other parties in the case and file a joint status report with the court and serve it on the appropriate parties at least 14 days before a status conference. A court-approved joint status report form is available on the court's website (LBR form F 7016-1.STATUS.REPORT) with an attachment for additional parties if necessary (LBR form F 7016-1.STATUS.REPORT.ATTACH). If the other parties do not cooperate in filing a joint status report, you still must file with the court a unilateral status report and the accompanying required declaration instead of a joint status report 7 days before the status conference. **The court may fine you or impose other sanctions if you do not file a status report. The court may also fine you or impose other sanctions if you fail to appear at a status conference.**

**KATHLEEN J. CAMPBELL
CLERK OF COURT**

Date of Issuance of Summons and Notice of Status Conference in Adversary Proceeding: _____

By: _____
Deputy Clerk

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

140 N. Harvard Avenue, #1538, Claremont, CA, 91711

A true and correct copy (1) of the foregoing document entitled: **SUMMONS AND NOTICE OF STATUS CONFERENCE IN ADVERSARY PROCEEDING [LBR 7004-1]** and (2) the accompanying pleading(s) entitled:
complaint to determine dischargeability and objecting to debtor's discharge pursuant to sections 523 and 727 of the
bankruptcy code.

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 03/06/2017, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

The Honorable Thomas Donovan, Roybal Bldg., 255 E. Temple, Room 1352, Los Angeles, CA, 90012

Ola Boyking, c/o William J. Smyth, Esq., 4929 Wilshire Blvd., Ste. 690, Los Angeles, CA, 90010

Streamline Trucking, LLC c/o Ola Boykin, 6406 S. Wilshire Blvd., Ste. 525, Los Angeles, CA 90048
Lisa Hawkins, 6404 Wilshire Blvd., Ste. 525, Los Angeles, CA 90048

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

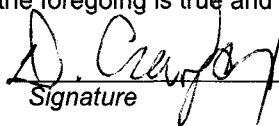
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

03/06/2017 D. Crawford

Date

Printed Name

Signature



B1040 (FORM 1040) (12/15)

ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		ADVERSARY PROCEEDING NUMBER (Court Use Only)		
PLAINTIFFS Armine Campbell	DEFENDANTS Ola Baykin, Lisa Hawkins, Streamline Trucking, LLC, and JDS ROTA			
ATTORNEYS (Firm Name, Address, and Telephone No.) Armine Campbell 1741 W 105th Street Los Angeles, CA 90047	ATTORNEYS (If Known)			
PARTY (Check One Box Only) <input type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input checked="" type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee	PARTY (Check One Box Only) <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> U.S. Trustee/Bankruptcy Admin <input type="checkbox"/> Creditor <input type="checkbox"/> Other <input type="checkbox"/> Trustee			
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) Complaint to Determine Dischargeability and Obtain Discharge Debtors Discharge Pursuant to Section 523+727 of the Bankruptcy Code				
NATURE OF SUIT (Number up to five (5) boxes starting with lead cause of action as 1, first alternative cause as 2, second alternative cause as 3, etc.)				
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input checked="" type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input checked="" type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div> </td> <td style="width: 50%; vertical-align: top; border: none;"> FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case) </td> </tr> </table>			FRBP 7001(1) – Recovery of Money/Property <input type="checkbox"/> 11-Recovery of money/property - §542 turnover of property <input type="checkbox"/> 12-Recovery of money/property - §547 preference <input type="checkbox"/> 13-Recovery of money/property - §548 fraudulent transfer <input checked="" type="checkbox"/> 14-Recovery of money/property - other FRBP 7001(2) – Validity, Priority or Extent of Lien <input type="checkbox"/> 21-Validity, priority or extent of lien or other interest in property FRBP 7001(3) – Approval of Sale of Property <input type="checkbox"/> 31-Approval of sale of property of estate and of a co-owner - §363(h) FRBP 7001(4) – Objection/Revocation of Discharge <input type="checkbox"/> 41-Objection / revocation of discharge - §727(c),(d),(e) FRBP 7001(5) – Revocation of Confirmation <input type="checkbox"/> 51-Revocation of confirmation FRBP 7001(6) – Dischargeability <input type="checkbox"/> 66-Dischargeability - §523(a)(1),(14),(14A) priority tax claims <input checked="" type="checkbox"/> 62-Dischargeability - §523(a)(2), false pretenses, false representation, actual fraud <input type="checkbox"/> 67-Dischargeability - §523(a)(4), fraud as fiduciary, embezzlement, larceny <div style="text-align: center;">(continued next column)</div>	FRBP 7001(6) – Dischargeability (continued) <input type="checkbox"/> 61-Dischargeability - §523(a)(5), domestic support <input type="checkbox"/> 68-Dischargeability - §523(a)(6), willful and malicious injury <input type="checkbox"/> 63-Dischargeability - §523(a)(8), student loan <input type="checkbox"/> 64-Dischargeability - §523(a)(15), divorce or separation obligation (other than domestic support) <input type="checkbox"/> 65-Dischargeability - other FRBP 7001(7) – Injunctive Relief <input type="checkbox"/> 71-Injunctive relief – imposition of stay <input type="checkbox"/> 72-Injunctive relief – other FRBP 7001(8) Subordination of Claim or Interest <input type="checkbox"/> 81-Subordination of claim or interest FRBP 7001(9) Declaratory Judgment <input type="checkbox"/> 91-Declaratory judgment FRBP 7001(10) Determination of Removed Action <input type="checkbox"/> 01-Determination of removed claim or cause Other <input type="checkbox"/> SS-SIPA Case – 15 U.S.C. §§78aaa <i>et seq.</i> <input type="checkbox"/> 02-Other (e.g. other actions that would have been brought in state court if unrelated to bankruptcy case)
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<input type="checkbox"/> Check if this case involves a substantive issue of state law	<input type="checkbox"/> Check if this is asserted to be a class action under FRCP 23			
<input type="checkbox"/> Check if a jury trial is demanded in complaint	Demand \$ 35,000 plus punitive damages			
Other Relief Sought				

